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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION EXTENDING TIME FOR
COMMUNITY CHOICE
AGGREGATORS TO RESPOND TO BAR
DATE MOTION**

Re: Dkt. No. 1784

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and G. Larry Engel, Esq.
4 (“**Engel**”), for this purpose only for the benefit of or on behalf of (1) Sonoma Clean Power
5 Authority (“**SCPA**”), (2) Clean Power SF (a division of the City and County of San Francisco),
6 City of San Jose, East Bay Community Energy Authority, Marin Clean Energy, Monterey Bay
7 Community Power, Peninsula Clean Energy, Pioneer Community Energy, Redwood Coast
8 Energy Authority, Silicon Valley Clean Energy Authority, Valley Clean Energy Alliance, the
9 Northern California Power Agency, the Transmission Agency of Northern California (the
10 “**Additional CCA Parties**”), and (3) the SCPA and other CCA program operating agencies or
11 member agencies who elect to file joinders with or in addition to Additional CCA Parties named
12 in **Exhibit A** hereto (collectively, the “**Participating Governmental Units**”), on the other hand.
13 The Debtors and Engel are referred to in this Stipulation and Agreement for Order collectively as
14 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

15 **RECITALS**

16 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
17 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*
18 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*
19 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*
20 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**
21 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any
22 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,
23 2019.

24 B. SCPA has prepared objections to the Bar Date Motion in which some or all of the
25 Additional CCA Parties may join or support by signing or filing separate responses of moderate
26 or less length, and Participating Governmental Units may join by signing or filing separate 1-2
27 page joinder responses supporting the SCPA objections or such related Additional CCA Parties’
28 filings. Engel, on behalf of or for the benefit of SCPA, the Additional CCA Parties, and other

1 Participating Governmental Units, has requested, and counsel for the Debtors has agreed, that the
2 time for the SCPA to file any objections to the Bar Date Motion and the time for the Additional
3 CCA Parties and the other Participating Governmental Units to file any such described joinders
4 or supporting responses to the any objection filed by SCPA (or their Additional CCA Parties'
5 supporting filings) be extended.

6 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
7 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
8 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
9 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
10 **THAT:**

11 1. The time for (i) SCPA to file and serve any response or opposition to the Bar Date
12 Motion, and (2) the Additional CCA Parties and other Participating Governmental Units to file
13 such joinders and responses in support of, or to sign on to, any response or opposition to the Bar
14 Date Motion filed by SCPA is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

15 Dated: May 28, 2019

Dated: May 28, 2019

16 KELLER & BENVENUTTI LLP

G. LARRY ENGEL, ESQ.

17 /s/ Jane Kim
Jane Kim

/s/ G. Larry Engel
G. Larry Engel

18 *Attorneys for Debtors*
and Debtors in Possession

Counsel for Sonoma Clean Power
Authority